

Application No. 10/627,120
Response dated: January 18, 2006
Reply to Office action of October 18, 2005

REMARKS

In response to the Office Action dated October 18, 2005, Applicant respectfully requests reconsideration based on the above claim amendments and the following remarks. Applicant respectfully submits that the claims as presented are in condition for allowance.

Claims 1-7 are pending in the present Application. Claim 1 is hereinabove amended leaving Claims 1-7 for consideration upon entry of the present amendment and following remarks.

Support for the amendment to Claim 1 is at least found in the specification, the figures, and the claims as originally filed. More particularly, support for amended Claim 1 is at least found in the specification at page 6, lines 5-9 and page 7, lines 21-31.

Reconsideration and allowance of the claims are respectfully requested in view of the above amendments and the following remarks.

Claim Rejections Under 35 U.S.C. §102

Claims 1 and 2 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 5,828,368 to Jung (hereinafter "Jung"). Applicant respectfully traverses.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Claim 1 recites, *inter alia*,

"counting the number of pulses of the horizontal synchronization signal from a pulse of the vertical synchronization signal to a subsequent pulse of the data enable signal, wherein the number of pulses of the horizontal synchronization signal are constant between the pulse of the vertical synchronization signal and the subsequent pulse of the data enable signal."

Referring to Jung, in the Office Action at Page 2, it is alleged that with respect to Fig. 5 and Col. 4, lines 23-25 and 38-44, the CPV pulses are synchronous with horizontal synchronization pulses, so counting the CPV pulses is equivalent to counting the horizontal synchronization pulses."

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Jung discloses counting a first number of clock pulse vertical (CPV) signals during a BLANK section of a data enable (DE) signal, saving the count value and counting a second number of CPV signals from the start of another BLANK section of the DE signal. (Summary of the Invention, Col. 3, lines 7-15.) Jung illustrates in Fig. 5, the number of horizontal synchronous signal (Hsynch) and the data enable signal (DE) is a changeable number. As further illustrated in Figs. 8 and 9, the clock pulse vertical (CPV) signals may have different periods. Jung further discloses that the number of CPV signals may change at Col. 4, lines 32-35 and 45-48.

That is, the number of CPV signals of Jung may be changed and vary and are therefore not synchronous with the horizontal synchronization pulses of the claimed invention. Thus, Jung does not disclose counting the number of pulses of the horizontal synchronization signal from a pulse of the vertical synchronization signal to a subsequent pulse of the data enable signal, wherein the number of pulses of the horizontal synchronization signal are constant between the pulse of the vertical synchronization signal and the subsequent pulse of the data enable signal of amended Claim 1.

Thus, Jung does not disclose all of the limitations of amended Claim 1. Accordingly, Jung does not anticipate amended Claim 1. Applicant respectfully submits that amended Claim 1 is not further rejected or objected and is therefore allowable. Claim 2 depends from Claim 1 and inherits all of the limitations of Claim 1. Accordingly, Claim 2 is correspondingly allowable as depending upon allowable Claim 1. Reconsideration, entry of the amendment and allowance of Claims 1 and 2 is respectfully requested.

Claim Rejections Under 35 U.S.C. §103

For an obviousness rejection to be proper, the Examiner must meet the burden of establishing that all elements of the invention are disclosed in the prior art and that the prior art relied upon, coupled with knowledge generally available in the art at the time of the invention, must contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or combined references. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir.

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1988); *In Re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970); *Amgen v. Chugai Pharmaceuticals Co.*, 927 U.S.P.Q.2d, 1016, 1023 (Fed. Cir. 1996).

Regarding Claim 3

Claim 3 is rejected under 35 U.S.C. §103(a) as being unpatentable over Jung in view of U.S. Patent 6,600,469 to Nukiyama et al., (hereinafter "Nukiyama"). Applicant respectfully traverses.

Claim 3 depends from Claim 1 and inherits all of the limitations of Claim 1. As discussed above, Jung does not disclose all of the limitations of amended Claim 1. Nukiyama is relied upon for teaching a method for driving a liquid crystal display wherein a precharging pulse is generated four clocks ahead of the main charging pulse in case of 2-dot conversion. Nukiyama also does not disclose counting the number of pulses of the horizontal synchronization signal from a pulse of the vertical synchronization signal to a subsequent pulse of the data enable signal, wherein the number of pulses of the horizontal synchronization signal are constant between the pulse of the vertical synchronization signal and the subsequent pulse of the data enable signal. That is, Nukiyama does not cure the deficiencies of Jung regarding Claim 3.

Thus, Jung and Nukiyama, alone or in combination, *do not teach or suggest all of the limitations* of Claim 3 and therefore *prima facie* obviousness does not exist regarding Claim 3 with respect to Jung and Nukiyama.

Additionally, since Jung and Nukiyama fail to teach or suggest all of the limitations of Claim 3, clearly, one of ordinary skill at the time of Applicant's invention would not have a motivation to modify or combine the references, nor a reasonable likelihood of success in forming the claimed invention by the Examiner's modifying or combining the references. Thus, here again, *prima facie* obviousness does not exist. *Id.*

Thus, *prime facie* obviousness does not exist regarding Claim 3. Applicant respectfully submits that Claim 3 is not further rejected or objected and is therefore allowable. Reconsideration, withdrawal of the relevant rejection and allowance of Claim 3 is respectfully requested.

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Regarding Claims 4-7

Claims 4-6 are rejected under 35 U.S.C. §103(a) as being unpatentable over Jung in view of U.S. Patent 5,394,171 to Rabii, (hereinafter "Rabii"). Applicant respectfully traverses.

Claim 4 recites, *inter alia*,

"counting the number of the pulses of the horizontal synchronization signal from a pulse of the vertical synchronization signal if the back porch of the vertical synchronization signal is maintained constant."

In an exemplary embodiment of the present invention, "back porch" is defined as the time period between a rising edge of the vertical synchronization signal VSYNC and a rising edge of a subsequent pulse of the DE signal. (See, page 7, lines 23-28.) As discussed above regarding Claim 1, Figs. 8 and 9 illustrate the clock pulse vertical (CPV) signals may have *different periods* and the number of CPV signals of Jung may be *changed and vary*. For all the reasons stated above, the CPV signals are not equivalent to the horizontal synchronization pulses and therefore the counting of the CPV pulses is not equivalent to counting the number of the pulses of the horizontal synchronization signal from a pulse of the vertical synchronization signal if the back porch of the vertical synchronization signal is maintained constant of Claim 4 as alleged by the Examiner.

Rabii is relied upon as teaching a method for determining whether polarities of vertical and horizontal synchronization signals are positive or negative. Rabii also does not disclose counting the number of the pulses of the horizontal synchronization signal from a pulse of the vertical synchronization signal if the back porch of the vertical synchronization signal is maintained constant of Claim 4. That is, Rabii does not cure the deficiencies of Jung regarding Claim 4. Claims 5 and 6 depend from Claim 4 and inherit all of the limitations of Claim 4.

Claim 7 is rejected under 35 U.S.C. §103(a) as being unpatentable over Jung in view of Rabii and further in view of U.S. Patent 6,879,321 to Santou, (hereinafter "Santou"). Applicant respectfully traverses.

Claim 7 depends from Claim 4 and inherits all of the limitations of Claim 4. As discussed above, Jung and Rabii do not disclose all of the limitations of Claim 4. Santou is relied upon as teaching a method where the counting reference points are rising edges of the

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vertical and the horizontal synchronization signals if the polarity of the vertical and horizontal synchronization signal is negative. Santou also does not disclose counting the number of the pulses of the horizontal synchronization signal from a pulse of the vertical synchronization signal if the back porch of the vertical synchronization signal is maintained constant of Claim 7. That is, Santou does not cure the deficiencies of Jung and Rabii regarding Claim 7.

Thus, Jung, Rabii and Santou, alone or in combination, *do not teach or suggest all of the limitations* of Claims 4-7, *prima facie* obviousness does not exist regarding Claims 4-7 with respect to Jung, Rabii and Santou.

Additionally, since Jung, Rabii and Santou fail to teach or suggest all of the limitations of Claims 4-7, clearly, one of ordinary skill at the time of Applicant's invention would not have a motivation to modify or combine the references, nor a reasonable likelihood of success in forming the claimed invention by the Examiner's modifying or combining the references. Thus, here again, *prima facie* obviousness does not exist. *Id.*

Thus, *prime facie* obviousness does not exist regarding Claims 4-7. Applicant respectfully submits that Claims 4-7 are not further rejected or objected and are therefore allowable. Reconsideration and allowance of Claims 4-7 is respectfully requested.

Conclusion

In view of the foregoing, it is respectfully submitted that the instant application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone conference with Applicant's attorneys would be advantageous to the disposition of this case, the Examiner is cordially requested to telephone the undersigned.

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In the event the Commissioner of Patents and Trademarks deems additional fees to be due in connection with this application, Applicant's attorney hereby authorizes that such fee be charged to Deposit Account No. 06-1130.

Respectfully submitted,

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